

Educational Testing Service

Principles, Policies and
Procedural Guidelines
Regarding ETS Products and Services

February 1, 1979



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PREFACE

Educational Testing Service (ETS) is a private, nonprofit, educational organization with primary involvement in the areas of measurement and research. In collaboration with a wide variety of institutions and agencies, ETS provides programs, research and services for the identification and recognition of individual talents and seeks to contribute to the expansion of opportunities available to all individuals.

ETS recognizes its responsibility to the individuals and institutions that it serves directly and to the larger society that ultimately must judge the value and efficacy of its work. This responsibility is implicit in the educational character under which ETS operates and is reflected in the products and services offered by the organization since its inception in 1947. Periodic and intense self-examination has been one means by which ETS has attempted to assure its continuing commitment to the broad constituency which it serves. As a step in that continuing process, ETS has developed these Principles, Policies and Procedural Guidelines Regarding ETS Products and Services (Guidelines), first published on August 1, 1977.

The Guidelines are designed to ensure that ETS products conform to uniformly high standards with respect to seven areas of basic importance: Accountability, Confidentiality of Data, Product Accuracy and Timeliness, Research and Development, Tests and Measurement, Test Use, and Technical Assistance, Advice and Instruction. The first three sections of the Guidelines deal with issues that relate to all ETS activities: Accountability, the responsibilities of ETS to those affected by its activities; Confidentiality of Data, the rights to and limitations on access to data collected by ETS; and Product Accuracy and Timeliness, the control of quality and performance according to scheduled commitments.

The remaining sections concern issues specifically relating to ETS' main endeavors: Research and Development, Tests and Measurement, Test Use, and Technical Assistance, Advice and Instruction.

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The Guidelines attempt to codify standards used in various ETS programs and services that should be considered for more general application and more formal articulation. ETS has not developed these Guidelines because of any legal requirements. They were not devised in response to any standards published by professional organizations, although ETS endorses the goals served by those efforts. These Guidelines are the result of an extensive deliberative process, which began at my direction in 1974. More than 150 members of the staff have participated in the initial development of the Guidelines and their subsequent review and revision. The Guidelines are drawn from the particular circumstances and needs at ETS and are designed to reflect its institutional objectives. Because of their origin and purposes, the Guidelines cannot generally or usefully be applied to organizations whose practices, programs or services differ from those of ETS.

The Guidelines include three types of statements, which have varying degrees of generality and significance. The principle that should underline ETS efforts in any given area is set first; policies to govern decision-making, and designed to foster more specific goals, are set forth next; and procedures relative to the conduct of specific ETS activities are last described. However, because the guidelines must apply to a broad diversity of programs and services with differing characteristics, each procedural guideline represents only one method of achieving the objectives stated in the policies.

Even the principles and policy statements might reasonably be expected to change in focus or coverage, as scientific developments or practical experience change the nature and desirability of various goals. Thus, the Guidelines are intended to encourage and not deter change and improvement. They should foster the development, exploration and use of alternative approaches that hold to high standards and serve important ETS policies.


ETS believes that the Guidelines can contribute significantly to the quality and utility of ETS products and services. The Guidelines have been distributed to executive, managerial and professional staff at ETS so that they may be applied in the course of their work at ETS. ETS does not have complete responsibility or authority, of course, to determine how the Guidelines will be implemented in ETS programs for which policy is substantially established by a sponsoring group other than ETS. ETS has, however, taken steps to encourage

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and assist those groups to implement the Guidelines as their activities relate to ETS. New activities ETS enters into will be held to this same expectation.

During the first year after their introduction, the Guidelines existed in provisional form. They were used in evaluating all ETS programs and services, and, where a substantial lack of compliance was found, steps were taken to achieve compliance within a reasonable time, or to revise particular provisions to reflect more accurately the diversity and practical demands of ETS operations. This process of review will continue as part of our organization-wide quality assurance effort and a report will be given to the Board of Trustees at regular intervals. We are committed to the effort to apply a set of positive criteria to our work and, taking the present document as a starting point, we will go forward with the continuing process of improving those criteria and consequently the programs and services ETS provides.

February 1, 1979


William W. Turnbull
President

ACCOUNTABILITY

Principle

ETS acknowledges responsibility for the effective stewardship of its resources to the New York Board of Regents which has issued its corporate charter; to the governing boards that sponsor and set policy for programs or services in which ETS products or services are used; to the individuals and committees that advise ETS with respect to appropriate policy for its programs; to the institutions and agencies that use ETS products and services; to persons who take ETS tests (and parents or guardians of minor persons), submit data for use by ETS or for distribution to others, or participate in research and development projects conducted by ETS; and to the professional associations that are concerned with educational and psychological measurement and research.

Policies

- A. ETS will furnish appropriate information to those to whom it is responsible so they may make informed, independent judgments as to the effectiveness with which ETS exercises its stewardship.
- B. ETS will seek, consider and, as appropriate, act on the views of those who sponsor, use or are affected by ETS programs and services.
- C. ETS will seek to obtain advice on its activities and policies from qualified men and women who are not employed or retained on a regular basis by ETS and who are drawn from appropriate professional disciplines,

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major philosophies and points of view, different geographic regions, and the major ethnic groups within the relevant population.

- D. ETS will support the activities of professional associations with respect to developing and implementing professional standards or codes, making available the results of current work, and fostering peer review of its activities.

Procedural Guidelines

1. Information should be provided to sponsoring organizations with which ETS has contractual relationships in a form that permits evaluation of ETS services in terms of:
 - a) quality;
 - b) timeliness;
 - c) costs; and
 - d) responsiveness to legitimate comments or criticisms.
2. Procedures should be established to facilitate communication with sponsors by:
 - a) meeting at least annually to provide information and to receive comments on matters affecting the operations with which they are concerned;
 - b) defining a mutually agreeable process to be used to transmit comments from sponsors or others and a time period within which the evaluation of comments will be completed and reports of actions to be taken by ETS can be expected.
 - c) making available periodic opportunities for sponsors to express opinions, judgments and counsel concerning their activities or programs directly to ETS officers not normally responsible for such activities or programs.

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3. Procedures should be established for making available technical and other information about ETS products and services to users so that they may evaluate the appropriate use of the product or service and communicate comments or criticisms to ETS.
4. Procedures should be established to communicate with or provide information to persons who use or take ETS tests, who submit data for use by ETS or for distribution to others, or who participate in research and development projects conducted by ETS. This information should be communicated by ETS or the sponsor in such a way that these persons may understand their participation with respect to:
 - a) the identity and scope of the sponsor's responsibility;
 - b) the nature of the product, service or research by which they are affected;
 - c) the way in which the product, service or research will likely be used by educational institutions or others; and
 - d) the channels that have been established for addressing comments or criticisms to ETS or to the sponsor and response thereto.
5. Organizational and program financial information should be recorded, processed and reported in accordance with generally accepted accounting principles and under appropriate safeguards to insure accuracy.
6. An annual report that provides information about organizational activities and finances should be published by ETS on a regular basis and made available to any person on request. Program and project reports, including program financial information, should be made available in a manner consistent with contractual understandings.

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7. Requests for information that is not included in an existing publication should be considered by the appropriate sponsor and by ETS. If its disclosure is consistent with applicable law, with ETS and sponsor policy, and with contractual obligations governing confidential or proprietary information, the information should be provided. If complying with a request for information results in a cost to ETS or a sponsor or affects the normal schedule of fulfilling ETS' responsibilities, ETS may provide the requested information in a reasonable period of time and at an appropriate price for the services rendered. Procedures should be established, as appropriate, to facilitate responses to these requests.
8. Changes in federal statutes, regulations and case law that affect research and development, testing programs, or advisory and instructional services should be monitored to insure that ETS activities and operations are in compliance as relevant federal laws or rules change. Changes in other statutes, regulations and case law should be evaluated as appropriate for the same purpose.
9. All proposed new ETS activities should be reviewed by counsel for compliance with applicable federal law and state law as appropriate. ETS officers and staff should direct the attention of legal counsel to matters that might affect ETS compliance.
10. Advice should be sought, where appropriate, from men and women drawn from diverse backgrounds, interests and experience (e.g., appropriate professional disciplines, major philosophies and points of view, various geographic regions, and major ethnic, handicapped and other relevant subgroups of the population of interest) who are qualified to make a contribution to the direction and substance of ETS programs and who are not employed or retained on a regular basis by ETS.

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11. Individuals who become members of an ETS external advisory, review or evaluation committee should be informed about the results of the committee's work in a reasonable period of time.
12. A reasonable accommodation should be made with respect to the professional responsibilities of the staff in order to permit staff members to attend professional meetings, to contribute to the development of professional standards or codes, to participate in and benefit from the dissemination of information on subjects of professional interest and to stay abreast of current concerns and accomplishments in related fields.
13. ETS should have effective procedures for peer review whenever that will contribute substantially to the quality of ETS work.
14. ETS should have effective and equitable procedures for handling questions of score authenticity arising in connection with the administration of tests.

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CONFIDENTIALITY OF DATA

Principle

ETS recognizes the right of individuals and institutions to privacy with regard to information supplied by and about them that may be stored in data or research files held by ETS and the concomitant responsibility to safeguard information in its files from unauthorized disclosure.

Policies

- A. ETS will ask individuals to provide information about themselves only if it is potentially useful to those individuals, necessary to facilitate processing of data or serves the public interest in improving understanding of human performance. Insofar as possible, individuals should be informed of the purpose for which the information is requested.
- B. The right of individuals to privacy regarding information about them that may be stored in the data or research files held by ETS extends both to processed information, such as scores based on test-item responses, and the raw data on which the processed information is based.
- C. ETS will protect the confidentiality of data supplied by institutions or agencies about themselves, and so identified, to the extent that such confidentiality does not conflict with ETS obligations to individuals.
- D. ETS will not collect or maintain in its data or research files any critical information that in its judgment cannot be protected adequately from improper disclosure.

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- E. ETS will encourage the organizations with which it works to adopt policies and procedures that adequately protect the confidentiality of the data transferred by ETS to those organizations.

Procedural Guidelines

1. Information about an individual, which has been identified as such, may not be released by ETS to organizations other than those for which the information was collected without the consent of that individual. A written exception may be made in the case of research studies during which the Committee on Prior Review of Research has determined that release of the data serves a public need, that there is no satisfactory and reasonable alternative way of obtaining the information, that the recipient researcher will use the data in appropriate ways and that there are adequate assurances of confidentiality.
2. Information about an institution, which has been identified as such, may be released from ETS only in a manner consistent with a prior agreement or with the consent of the institution or with the approval of the cognizant ETS officer and representative of the appropriate sponsor (if any).
3. An individual should be able, on payment of a reasonable fee, to authorize the disclosure of information about himself or herself from program data files held by ETS to any appropriate recipient, provided that such authorization is in writing and that disclosure is not inconsistent with other ETS or sponsor policies and does not violate the privacy of other individuals. Identification of the requester, through signature and data file number, or other appropriate method, should be required before any such information is released.

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4. In an emergency and when it is to the benefit of the individual, an authorization by telegram or telephone for the release of personal data should be acceptable, provided that such authorization includes adequate identifying information and that such release is not inconsistent with other ETS or sponsor policies. By prior agreement with the individual, authorization by a designated agency or institution should also be acceptable. In such instances, the individual should be informed that the disclosure has taken place.
5. If an individual is not competent because of illness or other considerations, information about that individual may be released from data files only with the consent of the individual's parent or legally appointed guardian.
6. Unless the access to confidential data can be safeguarded, ETS should not participate in any time-sharing network, data bank, or other electronic data processing or storage system involving units outside ETS.
7. On submission of appropriate identifying information and payment of a reasonable fee, an individual should be able to obtain information about himself or herself in ETS-held data files for the following purposes: to ascertain the accuracy of personal or biographical data and to request verification, within a reasonable period of time, of test scores or other processed information from tests, questionnaires, or school records, provided such release is consistent with sponsor policies.
8. Procedures should be developed for systematically eliminating from data files information that is judged to be out of date and, hence, of minimal value.

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9. Information from ETS-held program data files provided by individuals for a designated purpose should not be used or released for another purpose (such as a validity study or research project) without the individual's consent except when used or released in a form that cannot be identified with the individual.
10. ETS should refuse to provide personally identifiable information except in accordance with these guidelines unless served with a subpoena or other court order. In that event, ETS should make appropriate efforts to quash or narrow the subpoena or order or to obtain a protective order to minimize the exposure of personally identifiable information.
11. At the time information is collected and to whatever extent practical, programs should inform individuals of the conditions surrounding the release and confidentiality of the information about them.
12. Individuals should be identified in ETS research files only by code numbers. Information linking the code numbers to names should be kept in a secure location only as long as necessary for purposes such as follow-up studies or collating new data, after which the names should be destroyed.
13. Every organization with which ETS works should be informed of the confidential nature of any data transferred by ETS to that organization or collected by the organization on behalf of ETS so that appropriate procedures can be employed by the recipient organization to protect the confidentiality of such data.

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PRODUCT ACCURACY AND TIMELINESS

Principle

The accuracy of ETS' principal products and the timeliness with which they are made available are important parts of the responsibility ETS has undertaken with respect to its sponsors and the diverse public it serves.

Policies

- A. ETS will establish standards of accuracy and timeliness with respect to each principal product.
- B. ETS will use quality controls that are adequate to assure that its standards of accuracy and timeliness are met.
- C. ETS will make realistic delivery commitments and reasonable efforts to meet those commitments.
- D. ETS will sacrifice the timeliness of the delivery of information if the desired accuracy of that information is substantially in question.
- E. ETS will seek to inform those adversely affected if, subsequent to its release, information has been found not to meet ETS standards of accuracy.
- F. ETS will seek to inform those adversely affected if there is a probability that there will be substantial departure from ETS standards of timeliness with respect to a principal product.

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Procedural Guidelines

1. Principal products should be identified and a standard of accuracy using units of measurement appropriate to the type of product should be established for each.
2. When appropriate, quality control should include an adequate and independent recomputation and a visual reexamination of ETS-processed information based on an appropriate sample of cases sufficient to identify errors within the limits of the applicable standards of accuracy.
3. When the computational nature of the information is such that it is impossible or impractical to determine the accuracy of the information by independent recomputation, staff members who are technically competent to do so should assess its "reasonableness" as a part of quality control.
4. There should be a quality inspection of intermediate products when:
 - a) the accuracy of variable information (e.g. parameter data, algorithms), verified by independent recomputation or assessment, influences the nature of an ETS process or computation and is critical to the process that generates an ETS principal product; or
 - b) detection and correction of errors would facilitate meeting the delivery commitment on the principal product; or
 - c) the nature of the principal product is such that it is impossible or impractical to determine the accuracy of the information by independent computation using the source data.

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